

**DAVID J. HARRIS, ESQUIRE  
ATTORNEY FOR DEBTOR  
PA S. Ct. No.: 48558  
FL Bar No.: 0451207**

**69 Public Square, Suite 700  
Wilkes-Barre, PA 18701  
Telephone: (570) 823-9400  
Facsimile: (570) 208-1400  
E-Mail: dh@lawofficeofdavidharris.com**

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**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: :  
: :  
DOMINIC BUONSANTE : Chapter 7  
: Case No.: 5:17-bk-00739  
Debtor :  

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M&T BANK :  
Movant :  
v. :  
: :  
DOMINIC BUONSANTE :  
: :  
Debtor :  
and :  
: :  
ROBERT P. SHEILS, Jr., ESQUIRE, :  
: :  
Trustee :  

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**ANSWER OF DEBTOR TO MOTION OF M&T BANK FOR  
RELIEF FROM THE AUTOMATIC STAY**

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The Debtor, DOMINIC BUONSANTE, by and through his counsel, David J. Harris, Esquire, hereby answers the Motion of M&T Bank for relief from the automatic stay, as follows:

1. ADMITTED.
2. ADMITTED.
3. ADMITTED.
4. ADMITTED

5. ADMITTED.

6. DENIED. Strict proof thereof is demanded for trial.

7. DENIED. Strict proof thereof is demanded for trial. By way of further answer, there is equity in the subject property. Moreover, the Debtor has made a significant offer to Movant to cure the arrearage and pay the entire principal balance.

8. ADMITTED. By way of further answer, the Statement of Intention does not mandate how a Debtor must act.

9. DENIED. Strict proof thereof is demanded for trial.

10. DENIED. Movant's averment does not require an answer.

WHEREFORE, the Debtor respectfully requests that this Honorable Court deny the relief sought by Movant in its Motion.

**AFFIRMATIVE DEFENSES**

11. Debtor hereby incorporates by reference his answers in Paragraphs 1 through 10 above as if made a part hereof.

12. There is sufficient equity in the subject property.

13. Movant is adequately protected.

14. The subject property is necessary to the Debtor for an effective reorganization.

15. There is no cause for granting the relief sought by Movant in its Motion.

WHEREFORE, the Debtor respectfully requests that this Honorable Court deny the relief sought by Movant in its Motion.

RESPECTFULLY SUBMITTED

Dated: April 6, 2017  
Wilkes-Barre, Pennsylvania

By: /s/ David J. Harris  
DAVID J. HARRIS, ESQUIRE